

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

RITLABS, S.R.L.,

Plaintiff,

v.

Case No.: 1:12-cv-00215

Hon. Anthony J. Trenga

RITLABS, INC., et. al.

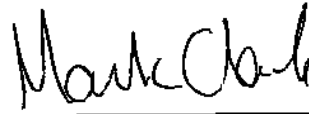
Defendants.

**DECLARATION OF MARK G. CLARK IN SUPPORT OF PLAINTIFF'S ATTORNEYS'
FEES AND NON-TAXABLE COSTS**

Pursuant to 28 U.S.C. § 1746, I, Mark Clark, state the following:

1. The matters declared herein are based on my personal knowledge.
2. I am Mark G. Clark, partner with Traverse Legal, PLC.
3. Prior to being substituted as counsel in this matter, Traverse Legal, PLC served as chief counsel in this case.
4. Traverse Legal, PLC's customary hourly rates for federal court litigation are \$285, \$325, and \$350 for partners and \$200 for associates.
5. Prior to substitution as counsel in this matter as counsel in this matter, Plaintiff, through Traverse Legal, PLC, incurred \$138,139.15 in attorneys' fees.
6. Additionally, Plaintiff incurred taxable costs in the amount of \$11,913.43 prior to substituting counsel.
7. Plaintiff also incurred non-taxable costs in the amount of \$14,578.66.
8. The attached spreadsheet is a true and correct summary of attorneys' fees, non-taxable costs, and taxable costs in this case.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Mark G. Clark, Traverse Legal, PLC

Date: 10/4/12

Date	Attorney's Fees	Costs	Invoice Total
December 20, 2011	\$950.00	\$0.00	\$950.00
January 11, 2012	\$2,300.00	\$0.00	\$2,300.00
February 1, 2012	\$6,285.50	\$33.22	\$6,318.72
March 1, 2012	\$5,105.50	\$0.00	\$5,105.50
April 6, 2012	\$12,376.00	\$1,109.55	\$13,485.55
May 7, 2012	\$6,821.50	\$781.09	\$7,602.59
June 12, 2012	\$19,453.50	\$5,214.10	\$24,667.60
July 16, 2012	\$50,675.15	\$15,537.16	\$66,212.31
August 2, 2012	\$18,268.00	\$1,346.11	\$19,614.11
September 4, 2012	\$14,278.50	\$2,279.37	\$16,557.87
September 19, 2012	\$1,625.50	\$290.98	\$1,916.48
Total Traverse Legal	\$138,139.15	\$26,591.58	\$164,730.73
<u>Taxable Costs</u>		<u>Memo</u>	
April 30, 2012	\$197.10	Transcription fee for MPI	
June 14, 2012	\$9,375.70	Transcription fees, Misty Klapper & Assoc.	
July 16, 2012	\$2,340.63	Network Deposition Services reporting	
Total Taxable Costs	\$11,913.43		
Total Costs - Taxable Costs	\$14,678.15		